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October 17, 1996

VIA COURIER (2 copies)

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OCT 17 1996
Federal Communications Commission
Office of Secretary

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

Re: Ex Parte Submission, CC Docket No. 96-98, Implementation of the Local Competition Provisions of the Telecommunications Act of 1996

Dear Mr. Caton:

Pursuant to 47 CFR § 1.1206(a)(1), I attach two copies of a written ex parte submission by Telesphere Solutions, Inc. concerning access to LEC operations support systems that is being presented today to Chairman Hundt, with copies to the Chief and Associate Chief of the Common Carrier Bureau and to the Policy Division of that Bureau.

Respectfully submitted,

Andrew D. Lipman
Russell M. Blau

cc: Chairman Hundt
Regina Keeney
Laurance Atlas
Richard Welch
Robb Tanner
Jason Donahue
David Fisher, Esq.

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TELESPHERE
SOLUTIONS, INC.

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October 15, 1996

Reed Hundt
Chairman of the FCC
Room 814
1919 M Street
Washington, D.C. 20554

Mr. Hundt:

This letter is to provide the FCC detail on "electronic bonding," defined as electronic communication between telecommunications service providers. It is our understanding at Telesphere Solutions, Inc., a fully-owned subsidiary of ADC Telecommunications, that the FCC, as one of the 14 points on the checklist RBOCs must meet to enter the long-distance business in-region, is requiring the RBOCs to unbundle their local loops and resell local services to CLECs (Competitive Local Exchange Carriers). The FCC is also demanding of RBOCs that to meet the checklist, the RBOCs must provide the CLECs operations support system access equivalent to what the LECs use internally to turn up and administer local services. Let me state, as a co-chair of one of the standards organizations that deliver electronic bonding standards and also as a vendor of electronic bonding gateways to service providers, that there is a great deal of uncertainty as to exactly what the FCC will require of LECs on January 1, 1997. Much of this uncertainty, Telesphere believes, is due to the fact that although the FCC is aware of electronic bonding, it may not have enough information to specify exactly what electronic interfaces carriers must support in order to provide an "equal" level of access. The purpose of this letter is to provide the FCC some of the background necessary to understand the current state of electronic communications in the U.S., and also to recommend an FCC benchmark which would be used to gauge whether or not a given LEC has provided an adequate level of electronic communications to its CLEC reseller customers.

As you may be aware, there are three primary standards organizations focusing on electronic bonding in the U.S. These organizations are the OBF (Ordering and Billing Forum), the T1M1.5 organization inside ATIS (Alliance for Telecommunication Industry Solutions), and ECIC (Electronic Communications Implementation Committee), inside ATIS. The OBF writes requirements, T1M1.5 writes information models based on those requirements, and ECIC writes gateway implementation recommendations based on the information models. Working together, these three organizations have provided the industry standards for applications such as Trouble Administration between carriers. Standards generated through this process are based on an internationally-defined model called TMN (Telecommunications Management Network). Historically, this process has been applied to produce electronic communications standards for electronic interfaces between LECs such as Bell Atlantic and IXCs such as AT&T. Although this process is effective, it typically takes 18 months between the time a concept is conceived and the time the associated standard is completed. Further, the gateways built using TMN standards are relatively expensive to implement.

For expediency sake, the OBF has determined that the above process will not be followed for the development of ordering standards for electronic communications for local loop resale. Instead,

another standard known as EDI (Electronic Data Interchange) will be used to provide automated links between carriers for local loop resale ordering. EDI, which is often used to exchange purchase orders between large companies, can also be applied to exchange telecommunications orders between carriers. In fact, another arm of the ATIS organization, the EDI subcommittee, has specifically developed EDI specifications designed to address intra-carrier ordering of telecommunications services. These specifications are complete, stable, and ready to implement today. Further, it is much easier, faster, and less expensive for a CLEC to build a gateway that meets the EDI interface than to build a gateway that meets the equivalent TMN interface (which would come out of T1M1 and ECIC, and does not exist today). We would be happy to provide you detail on why this is the case.

The one disadvantage of an EDI gateway in comparison to a TMN gateway is that EDI is historically not real-time. Of course, any LEC that offers an interface to a CLEC based on non real-time, batched-based EDI is not offering the same level of access to its network that the LEC has internally, since the LEC's internal access is real-time. Based on the technology available today, however, it is possible to implement a gateway quickly (in about 60 to 90 days time) that provides an EDI interface on a real-time basis. As an example, this can be done by implementing an EDI format across a Web browser (such as Netscape Navigator or Microsoft Internet Explorer) interface in a dedicated line environment. By doing so, a LEC can implement a real-time ordering gateway for the local loop in a short time and at a relatively low cost. These real-time EDI gateways provide most of the benefits of TMN-based gateways at a fraction of the cost and in a fraction of the time. More important, it is much more reasonable to require CLECs to support a simple browser-based application than to support an expensive TMN gateway. Incidentally, Telesphere believes that the industry can ultimately implement a TMN-based information model based on the ordering format of the EDI transaction sets (and it is Telesphere's plan to help drive this process forward), although this process will take some time.

Telesphere's primary focus in the marketplace is in providing electronic bonding gateways. In addition to building TMN-based gateways based on the standards that come out of the OBF, T1M1, and ECIC standards bodies, Telesphere also implements browser-based, real-time EDI gateways, as described above. Of course, some service providers are implementing their own real-time EDI gateways, and a number of other third party gateway providers exist in the marketplace.

It is Telesphere's recommendation to the FCC that the FCC should, at the minimum, require LECs to support real-time EDI gateways for reseller electronic communications for the ordering of services. These gateways should support, at the minimum, the following EDI transaction sets and associated functionality:

1) Purchase Order (850 ASCX12 Version 003030)- used to request the following services from the telecommunications provider:

    -Telephone number inquiries
    -Telephone number reservations
    -Telephone number reservation cancellations
    -Telephone number reservation confirmations
    -Due date inquiries
    -Due date reservations
    -Due date reservation cancellations
    -Due date reservation confirmations
    -Service requests

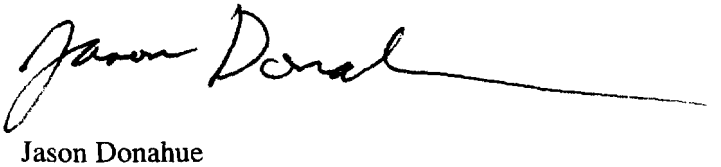
2) Purchase Order Acknowledgement (855 ASCX12 version 003030)- used for the acknowledgement from the telecommunications provider to the requester for above services.
3) Order Status Report (870 ASCX12 Version 003030)- used as notification from the telecommunications provider to the requester if the status of an order has changed, resulting in placing the order in jeopardy of making the desired due-dates.

Real-time gateways implementing the aforementioned transaction sets can reasonably be deployed by carriers in the short timeframe demanded by the FCC, they provide a reasonable level of access to CLECs, they are based on EDI standards that are stable and well-defined, and they offer an inexpensive method for CLECs to access LEC data and reserve phone lines for resale.

It is our belief, given the importance of true competition in the local loop, that the FCC must take an active role in defining exactly what level of electronic communications each LEC should provide to meet the checklist. If the FCC does not take an active role in defining electronic communications requirements, each LEC will likely argue for a different level of access to CLECs, and each LEC will also implement a different methodology. Ultimately, implementing all of these different methodologies will create a barrier to local competition that prohibits CLECs from reasonably competing in the local loop.

Telesphere would be glad to discuss electronic bonding in more detail with the FCC, or to provide the FCC more detailed information on electronic communications. You can reach me directly at (415) 845-2661.

Best regards,



Jason Donahue
Vice President
Telesphere Solutions, Inc.

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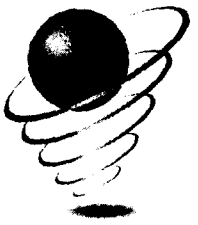
Lawrence Atlas, Common Carrier Bureau
Richard Welch, Policy Division
Robb Tanner, Policy Division



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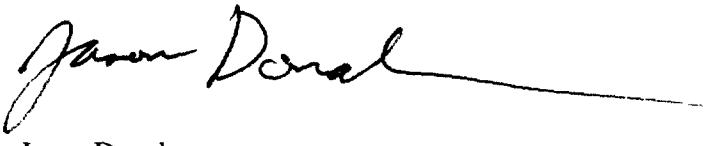

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